



Jon Richards

02/20/2002 04:24 PM

To: Brad Jackson/R4/USEPA/US@EPA

cc:

Subject: Re: Radium/Radiation PRGs/Cleanup Goals

from Reg3:

----- Forwarded by Jon Richards/R4/USEPA/US on 02/20/2002 04:24 PM -----



Bill Belanger

02/20/2002 03:25 PM

To: Jon Richards/R4/USEPA/US@EPA

cc:

Subject: Re: Radium/Radiation PRGs/Cleanup Goals



We've always used UMTRCA as an ARAR and never bothered to do an explicit risk calculation for the overall cleanup. At Austin Avenue, we left some material buried below a railroad track. In this case it did not exceed 40 CFR 192 cleanup levels, but somehow when the ROD was written the institutional controls were kicked in by ANY point above 5 pCi/g, not a 100 sq meter average. I did an intruder scenario risk calculation and found it to be well below the ten to the minus four level. We used this as a reason not to put in institutional controls.

Bill Belanger



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